

GIBSON DUNN

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September 12, 2024

Client: 14313-00094

VIA ECF

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Johansen v. Sony Music Entertainment, No. 19-cv-01094 (ER)

Dear Judge Ramos:

I represent defendant Sony Music Entertainment ("SME") in the above-captioned action.

On February 23, 2024, the parties jointly submitted a letter advising the Court that the parties had reached an agreement in principle to settle all claims in this case, subject to documentation. (Dkt. No. 178). On February 26, the Court entered an Order staying all proceedings in this action pending submission and review of papers in furtherance of the proposed settlement. (Dkt. No. 179). On June 10, SME requested the stay be extended until July 15, in order to allow the parties additional time to negotiate and execute a stipulation of settlement. (Dkt. No. 180). The Court granted the request on June 11. (Dkt. No. 181). On July 19, SME requested the stay be extended until September 16, in order to allow the parties additional time to negotiate and execute a stipulation of settlement. (Dkt. No. 183). The Court granted the request on July 23. (Dkt. No. 185).

The parties have continued to work diligently on a stipulation of settlement. Due to the complexity of the settlement terms and the press of other matters, the parties require additional time to negotiate and execute a stipulation of settlement before Plaintiffs can file a motion for preliminary approval of the settlement.

The parties therefore jointly respectfully requests an extension of the stay of all proceedings until October 28, 2024.

This is the third request for an extension to stay the proceedings.

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Sincerely,

GIBSON, DUNN & CRUTCHER LLP

s/ Scott A. Edelman

Scott A. Edelman

SAE/lr

cc: All Counsel of Record (via CM-ECF)